



October 18, 2019

Marlene H. Dortch Secretary
Federal Communications Commission 445 12th Street S.W.
Washington, DC 20554

I am writing regarding the pending FCC action concerning 9-1-1 location accuracy requirements and to express concerns with the "z-axis metric" level of accuracy. I am the Executive Director of Valley Communications Center, a 9-1-1 Center in King County, Washington. Our agency processes 450,000 9-1-1 calls annually, serving 24 police/fire/EMS agencies and a population of 800,000.

The 2015 FCC adopted rules require carriers to provide 9-1-1 centers such as Valley Com with the location of a caller when inside a building by either providing a dispatchable location - a street address plus room, floor, suite - OR "z-axis" technologies to estimate the height of a 9-1-1 caller. The FCC is posed to adopt an order that, in my view, will not serve the public well.

I have two significant concerns. First, the FCC proposed z-axis metric of +/- 3 meters is not a helpful description of a caller's location. Seconds count. If you've ever called 9-1-1, this should resonate with you. If First Responders in the 9-1-1 Center (Public Safety Telecommunicators) or in the field (police officers, firefighters and medical personnel) must spend *any* time trying to cross reference a location such as "40 meters above mean sea level", the impact is seconds or minutes lost in influencing a positive outcome for the caller. This may literally be the difference between living and dying. Adding complexity to 9-1-1 is simply unacceptable. We need immediate access to a recognizable location such as a floor number.

The second concern is the potential carriers may dispense with providing a dispatchable location altogether and instead provide the non-actionable z-axis metric as stated in the proposal. This would be a significant step-backwards for 9-1-1 and again, it is simply unacceptable. A dispatchable location as defined by the FCC is the gold standard from an operational perspective.

I urge you to consider this input and that of my 9-1-1 colleagues and consider requiring wireless carriers to provide a floor number as part of the z-axis information. Carriers must deliver actionable location information about 9-1-1 callers. The public expects us to know where they are and we cannot do that without your help.

William T. Pierson

A handwritten signature in black ink, appearing to read 'WTP', with a stylized flourish extending from the end.

Auburn Police Department
Chief of Police